

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GARDEN CITY BOXING CLUB, INC.

Civil Action No. 07-CV-04710

Plaintiff,

v.

ATTORNEY'S AFFIDAVIT OF
COSTS AND FEES

LA CASA DE SANTACRUZ CORP.
d/b/a SANTACRUZ BAR & RESTAURANT
and JOSE SANTACRUZ

Defendants,

STATE OF NEW YORK)
) ss.;
COUNTY OF SUFFOLK)

Paul J. Hooten, being duly sworn deposes and says:

1. That I am the attorney for Plaintiff, Garden City Boxing Club, Inc., in the above referenced matter and I am admitted to practice in this Court. I am fully familiar with all the facts, circumstances and proceedings heretofore had herein.

2. I make this attorney affidavit in support of Plaintiff's motion for default judgment and damages, costs and fees.

3. Plaintiff's litigation expenses as associated with the formation, pleading and filing of the above captioned matter are outlined below:

a. Filing Fees - \$350.00

b. Attorney fees - \$1,000.00

Total Litigation Expenses - \$1,350.00

4. Attorney fees at \$200.00 per hour for attorney time spent and \$75.00 for paralegal time spent are as follows:

<u>Date</u>	<u>Action</u>	<u>Hours</u>	<u>Fee</u>	
5/16/07	Factual research	.5	\$100.00	Atty.
5/24/07	Complaint drafted	1.00	\$200.00	Atty
6/1/07	Complaint filed with Court	.5	\$37.50	Para
6/15/07	Arranged Service	.5	\$37.50	Para
6/29/07	Reviewed Service	.25	\$50.00	Atty
7/6/07	Filed proof of service	.5	\$37.50	Para
9/4/07	Drafting Request for Default	1.00	\$200.00	Atty
9/4/07	Drafted Memorandum Of Law	1.00	\$200.00	Atty
9/10/07	Prepared and filed Request for Default	.5	\$37.50	Para
9/10/07	Prepared and filed Memorandum Of Law	1.25	\$100.00	Para

5. This action seeks judgment in the amount of \$20,000, plus interest at 9% from June 5, 2004, amounting to \$5,700.00, plus costs and legal fees amounting in all to \$27,050.00

WHEREFORE, plaintiff requests the entry of a Default and the entry of Judgment against the defendants.

BY: /s/ Paul J. Hooten

Paul J. Hooten & Associates (PJH9510)

Attorney for Plaintiff

5505 Nesconset Hwy., Suite 203

Mt. Sinai, New York 11766

(631)331-0547

Sworn to before me this

24th day of September, 2007

/s/ Cheryl E. Lorefice

Cheryl E. Lorefice

Notary Public, State of New York

No. 4999823

Qualified in Suffolk County

Commission Expires August 3rd, 2010

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
-----X
GARDEN CITY BOXING CLUB, INC.

Plaintiff

07 CV 04710

-AGAINST-

LA CASA DE SANTACRUZ CORP.
d/b/a SANTACRUZ BAR & RESTAURANT
and JOSE SANTACRUZ

STATEMENT OF DAMAGES

Defendant

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Amount of judgment.....	\$20,000.00
Interest at 9% from June 5, 2004 through August 31, 2007.....	\$ 5,700.00
Costs and Disbursements:	
Clerk's fee.....	\$ 350.00
Attorney fees.....	\$1,000.00
Total as of August 31, 2007.....	\$27,050.00